

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PUBLIC INQUIRY ON MODIFICATION OF SERVICE
PERFORMANCE MEASUREMENT SYSTEMS FOR
MARKET DOMINANT PRODUCTS

Docket No. PI2019-1

**UNITED STATES POSTAL SERVICE REQUEST FOR FINAL APPROVAL OF
SERVICE PERFORMANCE MEASUREMENT SYSTEM MODIFICATIONS FOR
INTERNATIONAL FIRST CLASS MAIL SERVICE
AND RETURN RECEIPT SERVICE**
(June 12, 2020)

The United States Postal Service ("Postal Service") requests the Postal Regulatory Commission's final approval of its proposed modifications to the internal Service Performance Measurement system ("SPM"), as noted in previous filings in this docket.¹ The Commission's approval of this request would authorize SPM as the official, legally sufficient measurement system for the three remaining Postal Service market dominant products currently measured on an external basis: International Inbound and Outbound First-Class Mail Service ("International FCM"), and Return Receipt/Green Card Service ("Return Receipt").

In Docket Nos. PI2015-1 and PI2018-2, the Commission approved the Postal Service's use of internal SPM for most of its market dominant products and services.² In response to the Postal Service's request,³ the Commission

¹ See United States Postal Service Response to Order No. 4945 and Request for Approval of Service Performance Measurement System Modification (May 21, 2019); Library Reference USPS-LR-PI2019-1/1, Modification of USPS Service Performance Measurement Plan, sections 5.2, 10.9.3, 5.2.3 (May 21, 2019) ("SPM Plan").

² Order No. 4697, Docket No. PI2015-1 (July 5, 2018); Order No. 4872, Docket No. PI2018-2 (November 5, 2018).

³ See FN 1, *supra*.

established this current docket to consider further proposed changes to the Postal Service's SPM Plan to add the three above-noted products.⁴

Subsequently, the Commission conditionally authorized the Postal Service to proceed with its proposed changes to the SPM Plan, provided that:

- a) the Postal Service furnish two consecutive quarters of data comparing service performance measurements obtained by existing systems against measurements obtained by the proposed systems, for the three additional products;
- b) the Postal Service explain any differences between the two measurement systems and validate that the proposed system produces accurate, reliable, and representative service performance data; and
- c) the Postal Service add analysis of the proposed system (*i.e.*, the changes to its modified SPM Plan) to the externally-procured quarterly audits already ordered by the Commission in Docket No. PI2015-1.⁵

In response, the Postal Service has filed several library references in this docket consisting of internal SPM data, consistent with its modified SPM Plan, measuring the service performance of International FCM, for Fiscal Year (FY) 2019 Quarters 3 and 4, and FY 2020 Quarter 1. These library references also include external audits (aka "audit addendums") evaluating this SPM data for accuracy, reliability, and representativeness, as per the Commission's directive. They also include responses by the Postal Service to any measurement issues

⁴ Order No. 5103, Notice and Order Establishing Proceeding to Consider Modifications to Market Dominant Service Performance Measurement Systems (May 22, 2019).

⁵ Order No. 5157, Order Conditionally Authorizing the Postal Service to Proceed with Changes to its Market Dominant Service Performance Measurement Systems (July 17, 2019).

raised by the external audits.⁶ As of today's date, the Postal Service has filed similar library references (containing internal SPM data and audit materials) pertaining to International FCM for FY 2020 Quarter 2, and Return Receipt Service for FY 2020 Quarters 1 and 2.⁷

These library references meet the Commission's requirements as summarized above. The library references include at least two consecutive quarters of data comparing service performance measurements from the existing system against measurements from the proposed system, for the three additional products: International Inbound and Outbound FCM, and Return Receipt. They also include materials explaining any differences between the two measurement systems and validating that the proposed system produces accurate, reliable, and representative service performance data. Finally, these library references include the required audit materials analyzing the use of internal SPM for these three additional products.

Accordingly, the Postal Service requests that the Commission provide final approval of the latest proposed modifications to its SPM Plan, which would result in the authorization of internal SPM as the sole and official measurement system for International Inbound/Outbound First Class Mail and Return Receipt/Green Card Service. The Postal Service requests prompt action on this request, as it is necessary to decide soon whether to commit resources to external service performance for these products for the next fiscal year. Specifically, the Postal

⁶ USPS Notice of Filing Library Reference USPS-LR-PI2019-1-1/2 (December 2, 2019); USPS Notice of Filing Library Reference USPS-LR-PI2019-1-1/3 (December 18, 2019); USPS Notice of Filing Library Reference USPS-LR-PI2019-1-1-4 (April 27, 2020).

⁷ USPS Notice of Filing Library Reference USPS-LR-PI2019-1-5 (June 12, 2020); USPS Notice of Filing Library Reference USPS-LR-PI2019-1-6 (June 12, 2020).

Service would be grateful to resolve the matters in this docket no later than July 3, 2020.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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